

TSD File Inventory Index

Date: July 16, 2009
Initial: CMH/MSD

Facility Name: <u>Kolo Agricultural Chemicals, Inc. (Old Felda Site)</u>	
Facility Identification Number: <u>ILD 068 517 093</u>	
A.1 General Correspondence	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	.1 Correspondence
.1 Correspondence	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests	.2 Import/Export Notifications
.6 Annual and Biennial Reports	C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring	D.1 Corrective Action/Facility Assessment
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A.4 Closure/Post Closure	.3 State Prelim. Investigation Memos
.1 Correspondence	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	Investigation of Potential Releases
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.1 Correspondence	.1 RFI Correspondence
.2 Reports	.2 RFI Workplan
B.1 Administrative Record	.3 RFI Program Reports and Oversight
	.4 RFI Draft /Final Report
	5. RFI QAPP

Total - 1

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.2 CMI Workplan		.5 Permitting	
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.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7.			

Note: Transmittal Letter to Be Included with Reports.

Comments: *One folder left*



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILD068517093 REACKNOWLEDGEMENT

KALO LABORATORIES INC
PO BOX 1086
QUINCY

IL 62301

INSTALLATION ADDRESS

525 KENTUCKY AT 6TH ST
QUINCY

IL 62301



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD068517093

REACKNOWLEDGEMENT

KALO LABORATORIES INC
PO BOX 1086
QUINCY

IL 62301

INSTALLATION ADDRESS

525 KENTUCKY AT 6TH ST
QUINCY

IL 62301

5	W	1	L	D	0	6	8	5	1	7	0	9	3	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
P 1 1 7	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

Nicholas A. Kohl, Jr.
Operations Manager

DATE SIGNED

8-11-80

A.4 Closure/
Post-Closure



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 0010650010 -- Adams County
Quincy/Kalo Agricultural
Closure Plan Approved: May 4, 1987 Log #C-300
ILD068517093
RCRA-Closure

February 27, 1989

Kalo Agricultural Chemicals, Inc.
Attention: James R. Scott
4550 West 109th Street, Suite 222
Overland Park, Kansas 66211

Dear Mr. Scott:

The subject hazardous waste management facility was inspected by a representative of this Agency on January 27, 1989. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated May 4, 1987.

Certification that the container (S01) storage unit had been closed in accordance with the approved closure plan by the owner/operator, Kalo Agricultural Chemicals, Inc., and an independent registered professional engineer, John W. Klingner, P.E., of Illinois was received at this Agency November 14, 1988.

The Agency has determined that the closure of the container (S01) storage unit has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265).

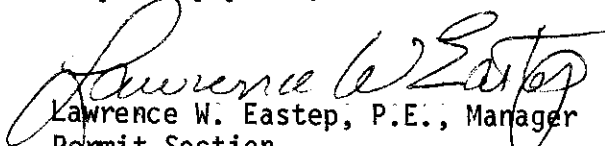
This facility must continue to meet the requirements of 35 Ill. Adm. Code, Part 722 (40 CFR, Part 262) -- Standards Applicable to Generators of Hazardous Waste and 35 Ill. Adm. Code, Part 723 (40 CFR, Part 263) -- Standards Applicable to Transporters of Hazardous Waste and is no longer subject to 35 Ill. Adm. Code, Part 725 Subpart H (40 CFR, Part 265 Subpart H) -- Financial Requirements.



Page 2

If you have any questions, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:ct/660k,40

cc: Central Region
USEPA Region V, Mary Murphy
USEPA Region V, Art Kawatachi
John W. Klingner, P.E.
Division File
Andy Vollmer
Compliance Section



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEBRUARY 4, 1987

KALO AGRICULTURAL CHEMICAL
525 KENTUCKY STREET
QUINCY, IL. 62301

RECEIVED

MAR 02 1987

Re: Closure Plan Review

Facility Name: KALO AGRICULTURAL CHEM.

USEPA ID #: 068517093

0010650010

Dear SIR,

U. S. EPA, REGION V
SWB - PMS

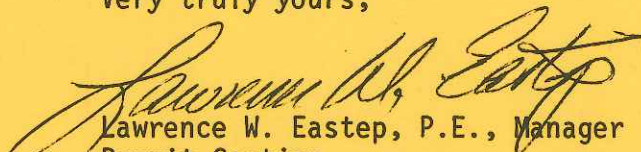
As you are aware, we are currently evaluating the request for closure of your facility as referenced above, and which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the Unit. Please note that both hazardous and non-hazardous wastes can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that any necessary corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to complete the enclosed certification form. Please read it carefully, complete it, and either sign and return it, or return it to us unsigned with a cover letter of explanation, within 30 days of the date of this letter. Public notice of your request for closure approval, and this request, will be in a newspaper of general circulation in the area of the facility.

Please call PERMIT SECTION at 217/782-6762 if you have any questions, or wish to discuss this matter further.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CA:tk:5/2/9

Enclosures

cc: David A. Stringham, USEPA - Region V ✓
Permit Section
Division File



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Log No. C-300-M-4
Received: June 6, 1988

Refer to: 0010650010 -- Adams County
Quincy/Kalo Agricultural
ILD068517093
RCRA-Closure

RECEIVED
WMD RCRA
RECORD CENTER

August 10, 1988

Kalo Agricultural Chemicals, Inc.
Attn: James R. Scott
4550 West 109th St., Suite 222
Overland Park, Kansas 66211

Dear Mr. Scott:

The closure plan modification submitted by ETI of North America has been reviewed by this Agency. Your final closure plan to close the hazardous waste container (S01) storage unit is hereby approved subject to the following conditions.

1. Closure activities must be completed by October 1, 1988. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by December 1, 1988.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. The closure plan must include a statement acknowledging this requirement.



Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

Also along with closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
 - b. A description of the method of waste handling and transport.
 - c. The waste manifest numbers.
 - d. Copies of the waste manifests.
 - e. A description of the sampling and analytical methods used.
 - f. A chronological summary of closure activities and the cost involved.
 - g. Color photo documentation of closure. Document conditions before, during and after closure.
 - h. Tests performed, methods and results.
2. The "Certification Regarding Potential Releases from Solid Waste Management Units" which you submitted has been forwarded to the USEPA for possible future action. The approval of this closure plan neither approves nor disapproves of the aforementioned "Certification".
 3. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.



Page 3

4. The 15ft x 15 ft hazardous waste storage area must be sealed with an industrial grade epoxy sealant.

Should you have any questions regarding this matter, please contact Eugene W. Dingleline at 217/782-5504.

Very truly yours,

A handwritten signature in cursive script that reads "Lawrence W. Eastep by [initials]".

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD/mls/2243j/80-82

Attachment

cc: Northern Region
Division File - Closure
Andy Vollmer
Michael P. Duffy, P.E.
USEPA Region V -- Jim Mayka
USEPA Region V -- Mary Murphy
Compliance Section



ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-300-M-4

The hazardous waste management S01 Unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Illinois
Registration Number

Date

DWD/mls/2243j/83



217/782-6762

Log No. 300
Received: 2/2/87

Refer to: 0010650010 -- Adams County
Quincy/Kalo Agricultural
ILD068517093
RCRA-Closure

May 4, 1987

Kalo Agricultural Chemicals, Inc.
Attention: James R. Scott
4550 West 108th Street, Suite 222
Overland Park, Kansas 66211

Dear Mr. Scott:

The closure plan and addenda prepared and submitted by ETI of North America has been reviewed by this Agency. Your final closure plan to close the hazardous waste container (SOT) storage area is hereby approved subject to the following conditions.

1. Closure activities must be completed by July 10, 1987. When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by September 8, 1987.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

Also along with closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:



Page 2

- a. The volume of waste and waste residue removed.
 - b. A description of the method of waste handling and transport.
 - c. The waste manifest numbers.
 - d. Copies of the waste manifests.
 - e. A description of the sampling and analytical methods used.
 - f. A chronological summary of closure activities and the cost involved.
 - g. Photo documentation of closure.
2. The "Certification Regarding Potential Releases from Solid Waste Management Units" which you submitted forwarded to the USEPA for possible future action. The approval of this closure plan neither approves nor disapproves of the aforementioned "Certification".
 3. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan.

Should you have any questions regarding this matter, please contact Eugene W. Dingleline at 217/725-2692.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EMD:ha/2374g/30-31

Attachment

cc: Central Region
Division File - Closure
Financial Assurance Unit
Don E. Kennedy, P.E., P.E.
USEPA Region V -- Jim Hayka
USEPA Region V -- Mary Murphy
Compliance Monitoring Section



ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. At least one copy of the certification must contain the original signatures.

Closure Certification Statement

The hazardous waste management unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Name and Title

Signature of Registered P.E.

Name of Registered P.E. and
Registration Number

Date

LWE:END:ba/2374g/32



Agricultural Chemicals, Inc.

525 Kentucky Street
Post Office Box 1086
Quincy, Illinois 62306
Phone: (217) 224-4000

August 10, 1984

Mr. Bill Zierath
Illinois Environmental Protection Agency
4500 South 6th Street Road
Springfield, IL 62706

RECEIVED

AUG 14 1984

ILLINOIS ENVIRONMENTAL AGENCY
STATE OF ILLINOIS

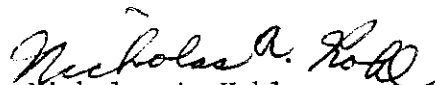
Dear Mr. Zierath,

Enclosed are two documents - "Job Description" and "Analysis Plan" concerning our Storage of Hazardous Wastes, which were not available at the time of your inspection, yesterday.

We trust that these items will evidence our compliance in these two areas.

Thank you - we know that you will contact us if further information or action is needed from Kalo.

Sincerely,


Nicholas A. Kohl
Operations Manager

Enclosures
NAK/pag

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AUG 15 1984
IEPA-DLPC

RECEIVED

AUG 15 1984

STATE OF ILLINOIS

JOB DESCRIPTION

Manufacturing Manager - Marvin Knuffman
Quincy, IL.

Jurisdiction over the following Supervisors and/or functions as developed by and with the Operations Manager, to attain corporate needs for implementing and continuing the following projects:

Mixing
Packaging
Inventory Control
Shipping and Receiving
Maintainence of machinery & equipment
Regulatory compliance, with primary
responsibility for handling and storage
of hazardous wastes.

While performing of various duties, to promote plant safety and security, good employee relations, and corporate well-being and profitability.

Nicholas A. Kohl

Operations Manager

KALO AGRICULTURAL CHEMICALS, INC.
Quincy, IL

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AUG 15 1984

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RECEIVED

AUG 11 1984

STATE OF ILLINOIS

Analysis Plan for Containers of Hazardous Wastes

After all contents have been deposited in a hazardous waste container the following procedures, or assay plans, are to be implemented:

A representative composite sample will be obtained from each container for analysis. This sampling will be repeated for retesting, prior to shipping hazardous waste container off-site for disposal, if more than 6 months has elapsed since previous assay was made.

. Determine physical characteristics - color, odor, form, etc.

Determine chemical composition - % of hazardous materials, % of chemical non-hazardous materials, amount and type of carriers. Thiram, Maneb, 2,4-D by U V absorbance of solutions. Captan, Lindane, Vitavax (carboxin) separated by gas chromatograph prior to flame ionization for quantity.

Nicholas C. Kohl

Operations Manager

KALO AGRICULTURAL CHEMICALS, INC.
Quincy, IL

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AUG 15 1984

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LPG #00106510 - Adams County
Quincy/Kalo Agricultural Chemicals
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD #068517093
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Kalo Agricultural Chemicals, Inc.
(B) Street: 525 Kentucky Avenue
(C) City: Quincy (D) State: Illinois (E) Zip Code: 62301
(F) Phone: 217/224-4000 (G) County: Adams
(H) Operator: Kalo Agricultural Chemicals, Inc.
(I) Street: 525 Kentucky Avenue
(J) City: Quincy (K) State: Illinois (L) Zip Code: 62301
(M) Phone: 217/224-4000 (N) County: Adams
(O) Owner: Kalo Agricultural Chemicals, Inc.
(P) Street: 4550 West 109th Street
(Q) City: Overland Park (R) State: KS (S) Zip Code: 66211
(T) Phone: 913/649-5325 (U) County: _____
(V) Date of Inspection: 8/9/84 (W) Time of Inspection (From) 8:00 am (To) 9:40 am
(X) Weather Conditions: Sunny, 80°F

RECEIVED
SEP 14 1984
IEPA-DLPC

Rev. 3-6-81/J.R.

Telephone

217/224-4000

Telephone

217/786-6892

(AA) Preparer Information

Telephone

217/786-6892

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment

1. Containers (I)

2. Tanks (J)

3. Surface Impoundments (K)

4. Waste Piles (L)

 D. Incineration and/or Thermal Treatment
(O and P)

E. Chemical, Physical, and Biological Treatment (Q)

B. Land Treatment (M)

C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

RECEIVED
SEP 14 1984
IEPA-DLPC

35 Illinois Administrative Code (35 IL. A. C.) Part 725 Subpart B)

(A) Has the Regional Administrator been notified regarding:

N/A (Not Applicable)

	N/A
--	-----

X Received by mail on 8/13/84

N/A - no waste from off-site

_____X_____

X Inside building on 3rd floor

X

IEPA-DLPC

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	-----
5. Safety, emergency equipment?	<u>X</u>	---	---	-----
6. Security devices?	<u>X</u>	---	---	-----
7. Operating and structural devices?	<u>X</u>	---	---	-----
8. Inspection log?	<u>X</u>	---	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	---	---	-----
2. Job descriptions?	<u>X</u>	---	---	Received by mail 8/13/84
3. Description of training?	<u>X</u>	---	---	-----
4. Records of training?	<u>X</u>	---	---	-----
5. Have facility personnel received required training by 5-19-81?	---	---	---	-----
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>X</u>	---	---	-----
2. No smoking signs?	<u>X</u>	---	---	-----
3. Separation and protection from ignition sources?	<u>X</u>	---	---	-----

*Not Inspected

RECEIVED
SEP 14 1984
IEPA-DLPC

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

35 IL. A. C. Part 725 Subpart C

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

_____ X _____ _____

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

 X _____ _____ _____

2. Telephone or 2-way radios
at the scene of operations?

 X _____ _____ _____

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

 X _____ _____ Sprinkler system; absorbants

Indicate the volume of water and/or foam available for fire control:

City Water _____

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

 X _____ _____ _____

2. Is emergency equipment
maintained in operable
conditions?

 X _____ _____ _____

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

 X _____ _____ _____

*Not Inspected

(E) Is there adequate aisle space
for unobstructed movement?

X _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

35 IL. A. C. Part 725 Subpart D

(A) Does the Contingency Plan contain the
following information:

Yes No NI* Remarks

1. The actions facility personnel
must take to comply with
(§725.151 & 725.156) §265.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part (as
applicable.)

X _____

2. Arrangements agreed by local
police departments, fire departments
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §265.37? (§725.137)

X _____

3. Names, addresses, and phone
numbers (office and home) of all
persons qualified to act as
emergency coordinators?

X _____

4. A list of all emergency equipment
at the facility which includes the
location and physical description
of each item on the list and a
brief outline of its capabilities?

X _____

5. An evacuation plan for facility
personnel where there is a possibility
that evacuation could be necessary?
(This plan must describe signal(s)
to be used to begin evacuation,
evacuation routes, and alternate
evacuation routes?)

X _____

*Not Inspected

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V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

Yes No NI* Remarks

(B) Are copies of the Contingency Plan available at site and local emergency organizations?

X

(C) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

X

2. Is coordinator familiar with all aspects of site operation and emergency procedures?

X

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X

(D) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

(725.156)

Had not occurred

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

(Part 265 Subpart E)

35 IL. A. C. Part 725 Subpart E

Yes No NI* Remarks

(A) Use of Manifest System

(725.171) 1. Does the facility follow the procedures listed in §265.71 for processing each manifest?

N/A - no waste from off-site

2. Are records of past shipments retained for 3 years?

N/A

(B) Does the owner or operator meet requirements regarding manifest discrepancies?

N/A

*Not Inspected

VI. RECORDKEEPING - Continued

C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73? (725.173)

X _____

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X _____

- c. The location and quantity of each hazardous waste within the facility?

X _____

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X _____

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

X _____

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

X _____

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

35 IL. A. C. Part 725 Subpart G

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>	___	___	_____
2. Has this plan been submitted to the Regional Administrator	___	<u>X</u>	___	_____
3. Has closure begun?	___	<u>X</u>	___	_____
4. Is closure estimate available by May 19, 1981?	<u>X</u>	___	___	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				___ ___ ___ <u>N/A</u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)
35 IL. A. C. Part 725, Subparts I thru R

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Kalo Agricultural Chemicals Date of Inspection: 8/9/84

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>	___	___	_____
2. Are containers compatible with waste in them?	<u>X</u>	___	___	_____
3. Are containers stored closed?	<u>X</u>	___	___	_____
4. Are containers managed to prevent leaks?	<u>X</u>	___	___	_____
5. Are containers inspected weekly for leaks and defects?	<u>X</u>	___	___	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	___	___	___	<u>N/A</u>

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	N/A
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	---	N/A

J
TANKS

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	_____
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	_____
5. Are required daily and weekly inspections done?	---	---	---	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	_____

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8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

^K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

- | | | | | |
|--|-------|-------|-------|-------|
| 1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? | _____ | _____ | _____ | _____ |
| 2. Do earthen dikes have protective covers? | _____ | _____ | _____ | _____ |
| 3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? | _____ | _____ | _____ | _____ |
| 4. Is the freeboard level inspected at least daily? | _____ | _____ | _____ | _____ |
| 5. Are the dikes inspected weekly for evidence of leaks or deterioration? | _____ | _____ | _____ | _____ |
| 6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | _____ | _____ | _____ | _____ |
| 7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b)) | _____ | _____ | _____ | _____ |

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L
WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 ILCS A. C. 725.117 (b))	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

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M

LAND TREATMENT

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273? (725.373)

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? (725.376)

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? (725.378)

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) (725.117 (b))

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N
LANDFILLS

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	-----
**2. Collection of run-off from active portions of the fill?	---	---	---	-----
**3. Is collected run off treated?	---	---	---	-----
4. Control of wind dispersal of hazardous waste?	---	---	---	-----
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	-----
2. The contents of each cell and the location of each hazardous waste type within each cell?	---	---	---	-----
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	-----
2. Has this plan been submitted to the Regional Administrator?	---	---	---	-----
3. Has closure begun?	---	---	---	-----
4. Is closure cost estimate available by 5-19-81?	---	---	---	-----
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	-----

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	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))				
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?				
If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))				
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?				
2. Does the landfill have a chemically and physically resistant liner system?				
3. Does the landfill have a functional leachate collection system?				
4. Are free liquids stabilized prior to or immediately after placement in the landfill?				
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?				

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O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
---	-----	----	-----	---------

a. Heating value

b. Halogen content

c. Sulfur content

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2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____
2. _____
3. _____
4. _____
5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Are combustion/emission control instruments monitored at least every 15 minutes?

B. Is steady state maintained or corrections attempted?

C. Is stack plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?**

E. If yes to D above, were corrections made to return emissions to normal appearance?**

F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Are emergency shutdown controls and system alarms checked daily for proper operation?

*Not Inspected

*Specify in Remarks for what period of time this was checked.

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IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

- | | Yes | No | NI* | Remarks |
|---|-----|----|-----|---------|
| 1. Does this facility burn <u>only</u> waste explosives?
(A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.) | — | — | — | |
| 2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below) | — | — | — | |

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

- | | Yes | No | NI* | Remarks |
|---|-----|----|-----|---------|
| 1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? | — | — | — | |
| 2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?) | — | — | — | |

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Yes No NI* Remarks

3. Has the owner or operator addressed the waste analysis requirements of 265.402? (725.502)

4. Are inspection procedures followed according to 265.403? (725.503)

5. Are the special requirements fulfilled for ignitable or reactive wastes?

6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) (725.117 (b))

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

Yes No NI* Remarks

(A) Does the operator have copies of the manifest available for review?

X _____

(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)

1. Manifest document number?

X _____

2. Name, mailing address, telephone number, and EPA ID Number of Generator

X _____

RFC

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	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	_____	_____	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	_____	_____	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	_____	_____	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	_____	_____	_____
7. Required certification?	<u>X</u>	_____	_____	_____
8. Required signatures?	<u>X</u>	_____	_____	_____
(C) Does the owner or operator submit exception reports when needed?	_____	_____	_____	<u>Not needed</u>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	_____	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	_____	_____	_____
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	_____	_____	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation Facility did not file Part A

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	<u>X</u>	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<u>X</u>	_____	_____	At this time they are in compliance. P012 waste previously stored.
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	<u>X</u>	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				N/A - waste stored in drums
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) (35 IL. A. C. 725.117 (b))	_____	_____	_____	_____

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(Part 262, Subpart D)
35 IL. A. C. Part 722, Subpart D

Yes	No	NI*	Remarks
-----	----	-----	---------

- X _____

- X _____

(Part 262, Subpart E)

_____ X _____

.....

- _____

- [illegible]

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263
35 IL. A. C. Part 723

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_____	_____	_____	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

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REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Facility did not file Part A permit application. Facility would be in apparent compliance with interim status standards if Part A had been filed.

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Agricultural Chemicals, Inc.

00106510 - Adams Co
Quincy/Kalo Lakes

525 Kentucky Street
Post Office Box 1086
Quincy, Illinois 62306
Phone: (217) 224-4000

August 29, 1983

Environmental Protection Agency
4500 S. Sixth Street
Springfield, IL 62706

Atten: Glenn D. Savage, Jr.
Central Region Manager
Land Field Operations Section
Division of Land Pollution Control

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E.P.A. - D.L.P.C.
STATE OF ILLINOIS

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AUG 30 1983

ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

Dear Mr. Savage,

The following information is given in response to your Compliance Inquiry Letter dated August 12, 1983. Thus, all of the following data relates to the 35 Illinois Administrative Code compliance.

725.115(b):

Monitoring and inspecting of the following equipment and supplies are being done on regular schedules as follow -

Dust collection equipment: weekly (and, or) monthly, dependent on production activity.

Clean Up/Spill Stations (as outlined in location description sheet): semi-monthly.

725.114(c):

20" X 14" metal signs reading "DANGER Authorized Personnel Only" are in place at entrance ways to areas in our Kalo facilities where hazardous materials are processed, or hazardous wastes are stored.

725.116(a):

Formal Personnel Training Sessions for handling of and exposure to hazardous material and wastes are being held initially at time of hire and semiannually thereafter, to coincide with production seasons. Employee sign up sheets will record this activity.

725.274:

Inspections of area where hazardous wastes are stored are being made on a weekly basis and record of same is being kept.

725.212:

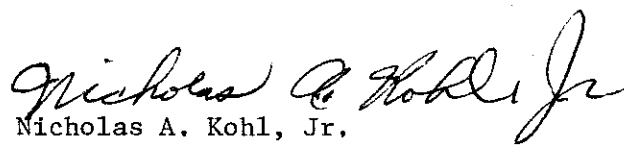
A closure plan of facility activities relating to hazardous material production and wastes has been formulated which includes -

- 1.) how equipment would be decontaminated.
- 2.) the approximate time needed for the operations involved.

- 3.) the approximate cost of these functions,
- 4.) the approximate inventory of hazardous wastes in storage at time of closure.

Copies of documents and forms related to aforementioned functions are enclosed. Please notify us if more information is required, or if further actions are needed.

Sincerely,


Nicholas A. Kohl, Jr.
Operations Manager

NAK/pag
Enclosures

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
OBSERVATION REPORT - L P C F C O 5 5 C
(T) (8)(9)

EDP Date _____

Adams County Quincy 1 Kalo Agricultural Chemicals Site Code 00106510
(11) (18)
Time: From 08:00 am Photos Taken: Yes (# 1) No () Region C Date 08/09/84
(19) (20) (25)
To 09:40 am Site Open: Yes (X) No () Letter Sent (Yes or No) Yes
(26)
Samples Taken: Yes () No (X) Groundwater () Surface () Other () Inspector W E Z
(27) (29)
Interviewed N. Kahl Weather Sunny 80°F
Previous Inspection 7-27-83 Previous Correspondence 8-2-83

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)	Sanitary Landfill ()	Transfer ()	E.P.A. Permit ()
Temporarily Closed ()	Random Dump ()	Dump ()	Variance ()
Closed not Covered ()	Other <u>Generator (Storage)</u> (X)		21 (d) ()
Closed and Covered ()	Quantity Received Daily (1-6) _____		Board Order ()
	(30)		Other ()
			None (5) ()
			(31)

GENERAL REMARKS

An interim status standards inspection was conducted at this
agricultural products plant on August 9, 1984. See memorandum dated
August 9, 1984 for details.

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Date: 8-9-84

Time: 8:00-9:40 (A.M.) P.M.

Photograph By:

W. E. Zocath

Location: LPC#00106510

Adams Co.

Quincy 1 Kalo Agri Chem

Comments: Photograph taken

toward the north from the

east end of the third floor

of the building

Roll #67 # 9



Date: _____

Time: _____ A.M. P.M. ✓

Photograph By: _____

Location: _____

_____ Co.

Comments: Photograph taken

toward the

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Agricultural Chemicals, Inc.

525 Kentucky Street
Post Office Box 108
Quincy, Illinois 62300
Phone: (217) 224-4000

August 26, 1983

To whom it may concern:

Closure plan relating to Kalo Hazardous Material products and resultant wastes:

Steps related to phasing out of all EPA regulated products are as follows -

Dry (powdered) items:

Step 1. Removal of all visible excess materials in mixing, conveying, packaging, and dust collection equipment by direct scraping, wiping, and brushing.

Step 2. Detergent application to all contact surfaces.

Step 3. Replacement of dust collector filter bags.

Steps 1, 2, and 3 would require 4 weeks with costs approximately \$8,400.00 for labor and \$900.00 for materials.

Liquid items:

Step 4. Removal of all visible excess material in mixing, conveying and packaging equipment by rinsing.

Step 5. Detergent application to all contact surfaces.

Steps 4 and 5 would require 2 weeks with costs approximately \$4,100.00 for labor and \$250.00 for materials.

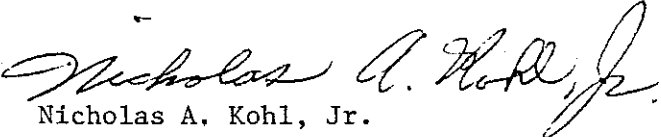
Estimated maximum inventory of wastes at a given future time is 300 gallons or 2,000 lbs. approximately. These hazardous wastes are primarily dry powders in approximate concentration of 20% or less of hazardous material. In a "phase out" of all hazardous material product lines, (or a plant closing situation) these "gallon or pound" estimates could double or triple due to clean up wastes and obsolete materials.

Once a decision was reached to phase out hazardous material products, or to close the plant, approximately 60 days (clean up period) would ensue to time when no further hazardous wastes would be generated. Total labor and material costs as indicated above, are estimated at \$13,650.00 plus costs for final hazardous waste disposal of \$1,500.00; for overall estimate of \$15,150.00.

RECEIVED

AUG 30 1983

DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE OF ILLINOIS


Nicholas A. Kohl, Jr.
Operations Manager



Environmental Protection Agency

4500 S. Sixth Street Springfield, IL. 62706
Ph. (217) 786-6892

CERTIFIED MAIL
#157194

August 12, 1983

Refer to: LPC #00106510 - Adams County
Quincy/Kalo Agri. Chemicals, Inc.
ILD #068517093
COMPLIANCE INQUIRY LETTER

Kalo Agricultural Chemicals, Inc.
525 Kentucky Avenue
Quincy, Illinois 62301

ATTENTION: Mr. Nicholas Kohl, Jr.

Dear Mr. Kohl:

On July 27, 1983, a representative of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility in Quincy. The purpose of the inspection was to determine your facility's compliance with the Illinois Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111½, §§1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection, the following apparent violations were observed:

... Pursuant to the 35 Illinois Administrative Code (35 IL. A. C.) 725.115(b), the owner/operator is to establish and maintain inspection records and schedules which detail records of malfunctions, operator errors, discharges, safety and emergency equipment, security devices, and operating and structural devices. You are in apparent violation of the 35 IL. A. C. 725.115(b) for the following reasons: The requirements of this section are not being met.

... Pursuant to the 35 IL. A. C. 725.114(c), the owner/operator must post a sign with the legend, "Danger-Unauthorized Personnel Keep Out" at each

Kalo Agricultural Chemicals, Inc.
Page 2
August 12, 1983

entrance to the active portion of the facility and at other locations which can be seen from any approach to this active portion. At the time of the inspection, this sign had not been erected.

... Pursuant to the 35 IL. A. C. 725.116(a), the owner/operator must maintain personnel training records at the facility in accordance with paragraph (d)(1) of this section. At the time of the inspection, the owner/operator was not keeping these records.

... Pursuant to the 35 IL. A. C. 725.274, the owner/operator must inspect areas where containers are stored at least weekly. These inspections are not being conducted.

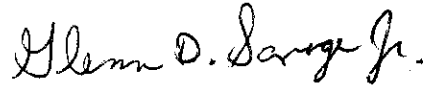
... Pursuant to the 35 IL. A. C. 725.212, the owner/operator must have a closure plan at the facility. The plan must include a description of how and when the facility will be partially closed, if applicable, and ultimately closed. The plan must address the steps needed to decontaminate facility equipment. Also required is an estimate of the maximum inventory of wastes in storage or treatment on-site at any given time and a schedule for final closure, including the anticipated date when wastes will no longer be required. The owner/operator must submit his closure plan to the Director at least 180 days before the date he expects to begin closure. You are in apparent violation of the 35 IL. A.C. 725.212 for the following reasons: The requirements of this section have not been met.

You are hereby requested to submit to this Agency, within fifteen (15) days of receipt of this letter, a description of steps taken to correct the apparent violations described in this letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the

Kalo Agricultural Chemicals, Inc.
Page 3
August 12, 1983

above address. Should you have any questions concerning this matter, please contact David C. Jansen of my staff at the above number.

Sincerely,



Glenn D. Savage, Jr.
Central Region Manager
Land Field Operations Section
Division of Land Pollution Control

GDS/GES/cp

Enclosure

cc: DLPC/Division File
DLPC/FOS, Central Region

LPC #00106510 - Adams County
Quincy/Kalo Agri. Chemicals
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD #068517093
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Kalo Agricultural Chemicals, Inc.
(B) Street: 525 Kentucky Avenue (Kentucky at 6th Street)
(C) City: Quincy (D) State: IL. (E) Zip Code: 62301
(F) Phone: 217/224-4000 (G) County: Adams
(H) Operator: Kalo Agricultural Chemicals, Inc.
(I) Street: 525 Kentucky Avenue
(J) City: Quincy (K) State: IL. (L) Zip Code: 62301
(M) Phone: 217/224-4000 (N) County: Adams
(O) Owner: Kalo Agricultural Chemicals, Inc.
(P) Street: 4550 West 109th Street
(Q) City: Overland Park (R) State: Kansas (S) Zip Code: 66211
(T) Phone: 913/649-5525 (U) County: _____
(V) Date of Inspection: 7/27/83 (W) Time of Inspection (From) 1:00 P. (To) 3:00 P.
(X) Weather Conditions: Sunny, 70°

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed

Nicholas Kohl, Jr.

Title

Oper. Mgr.

Telephone

217/224-4000

(Z) Inspection Participants

Gerald E. Steele

Agency/Title

IEPA/EPs II

Telephone

217/786-6892

(AA) Preparer Information

Name

Gerald E. Steele

Agency/Title

IEPA/EPS II

Telephone

217/786-6892

Gerald E Steile

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment

I. Containers (I)

2. Tanks (J)

3. Surface Impoundments (K)

4. Waste Piles (L)

 D. Incineration and/or Thermal Treatment
(O and P)

E. Chemical, Physical, and Biological Treatment (Q)

B. Land Treatment (M)

C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:

(Part 265 Subpart B)

35 Illinois Administrative Code (35 IL. A. C.) Part 725 Subpart B)

Yes No NI* Remark

(A) Has the Regional Administrator been notified regarding:

- | | | | | |
|--|-------|----------|-------|---------------|
| 1. Receipt of hazardous waste from a foreign source? | _____ | <u>X</u> | _____ | None received |
| 2. Facility expansion? | _____ | <u>X</u> | _____ | No expansion |

(B) General Waste Analysis:

- | | | | | |
|---|----------|-------|-------|---------------------------------|
| 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | <u>X</u> | _____ | _____ | |
| 2. Does the owner or operator have a detailed waste analysis plan on file at the facility? | <u>X</u> | _____ | _____ | |
| 3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | _____ | _____ | _____ | No waste received from off-site |

(C) Security - Do security measures include:
(if applicable)

- | | | | | |
|---|----------|----------|----------|------------------------------|
| 1. 24-Hour surveillance? | _____ | _____ | <u>X</u> | |
| 2. Artificial or natural barrier around facility? | <u>X</u> | _____ | _____ | Inside building on 3rd floor |
| 3. Controlled entry? | <u>X</u> | _____ | _____ | |
| 4. Danger sign(s) at entrance? | _____ | <u>X</u> | _____ | Will install |

(D) Do Owner or Operator Inspections Include:

- | | | | | |
|-------------------------------|-------|----------|-------|---------------|
| 1. Records of malfunctions? | _____ | <u>X</u> | _____ | See Comment A |
| 2. Records of operator error? | _____ | <u>X</u> | _____ | See Comment A |
| 3. Records of discharges? | _____ | <u>X</u> | _____ | See Comment A |

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>---</u>	<u>X</u>	<u>---</u>	<u>See Comment A</u>
5. Safety, emergency equipment?	<u>X</u>	<u>---</u>	<u>---</u>	<u>See Comment A</u>
6. Security devices?	<u>---</u>	<u>X</u>	<u>---</u>	<u>See Comment A</u>
7. Operating and structural devices?	<u>X</u>	<u>---</u>	<u>---</u>	<u>See Comment A</u>
8. Inspection log?	<u>---</u>	<u>X</u>	<u>---</u>	<u>See Comment A</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	<u>---</u>	<u>---</u>	<u>-----</u>
2. Job descriptions?	<u>X</u>	<u>---</u>	<u>---</u>	<u>-----</u>
3. Description of training?	<u>X</u>	<u>---</u>	<u>---</u>	<u>-----</u>
4. Records of training?	<u>---</u>	<u>X</u>	<u>---</u>	<u>Will start keeping</u>
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	<u>---</u>	<u>---</u>	<u>-----</u>
6. Do new personnel receive required training within six months?	<u>X</u>	<u>---</u>	<u>---</u>	<u>-----</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>---</u>	<u>---</u>	<u>---</u>	<u>None Handled</u>
2. No smoking signs?	<u>---</u>	<u>---</u>	<u>---</u>	<u>-----</u>
3. Separation and protection from ignition sources?	<u>---</u>	<u>---</u>	<u>---</u>	<u>-----</u>

*Not Inspected

35 IL. A. C. Part 725 Subpart C

Yes	No	NI*	Remarks
-----	----	-----	---------

X

X _____

X _____

X _____

Plant sprinkled. Keep diatomaceous earth on hand for liquid spills,
and an oiled vermiculite flake for the powdery solids.

X _____

(E) Is there adequate aisle space
for unobstructed movement?

X _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

35 IL. A. C. Part 725 Subpart D

(A) Does the Contingency Plan contain the
following information:

Yes No NI* Remarks

1. The actions facility personnel
must take to comply with
(§725.151 & §725.156) §265.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part (as
applicable.)

X _____

2. Arrangements agreed by local
police departments, fire departments
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §265.37? (§725.137)

_____ X _____

Have one for F.D., but
not hospitals

3. Names, addresses, and phone
numbers (office and home) of all
persons qualified to act as
emergency coordinators?

X _____

4. A list of all emergency equipment
at the facility which includes the
location and physical description
of each item on the list and a
brief outline of its capabilities?

_____ X _____

See Comment B

5. An evacuation plan for facility
personnel where there is a possibility
that evacuation could be necessary?
(This plan must describe signal(s)
to be used to begin evacuation,
evacuation routes, and alternate
evacuation routes?)

_____ _____ X _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	X	—	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X	—	—	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X	—	—	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X	—	—	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	X	—	
(725.156)				

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

35 IL. A. C. Part 725 Subpart E

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
(725.171) 1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	—	—	—	No wastes have been shipped
2. Are records of past shipments retained for 3 years?	—	—	—	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				
	—	—	—	

VI. RECORDKEEPING - Continued

C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73? (725.173)

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X _____

- c. The location and quantity of each hazardous waste within the facility?

X _____

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X _____

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

_____ X

Plan not implemented
for spill of hazardous
waste

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

_____ X

N/A

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

35 IL. A. C. Part 725 Subpart G

(A) Closure and Post Closure

- X

- X

- _____X_____

X

USE AND MANAGEMENT OF CONTAINERS

Yes	No	NI*	Remarks
-----	----	-----	---------

- X _____

-

-
- X
-

- X _____

- X

- | | |
|---|--------------|
| X | None handled |
|---|--------------|

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	None Handled -----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	---	None Handled -----

J
TANKS

Facility Name: -----

Date of Inspection: -----

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	-----
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	-----
5. Are required daily and weekly inspections done?	---	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	-----

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line: _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)
(35 IL. A. C. 725.117 (b))

L

WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

*Not Inspected

LAND TREATMENT

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273? (725.373)

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? (725.376)

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? (725.378)

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) (725.117 (b))

N
LANDFILLS

Facility Name: _____

Date of Inspection: _____

Yes No NI* Remarks

(A) General Operating Requirements

Does the facility provide the following:

**1. Diversion of run-on away from active portions of the fill?

**2. Collection of run-off from active portions of the fill?

**3. Is collected run off treated?

4. Control of wind dispersal of hazardous waste?

(**Effective 11-19-81)

(B) Surveying and Recordkeeping

Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell?

2. The contents of each cell and the location of each hazardous waste type within each cell?

(C) Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81?

2. Has this plan been submitted to the Regional Administrator?

3. Has closure begun?

4. Is closure cost estimate available by 5-19-81?

(D) Special requirements for ignitable or reactive waste

Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))	---	---	---	---
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	---	---	---	---
If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))	---	---	---	---
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	---	---	---	---
2. Does the landfill have a chemically and physically resistant liner system?	---	---	---	---
3. Does the landfill have a functional leachate collection system?	---	---	---	---
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	---	---	---	---
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	---	---	---	---

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____
2. _____
3. _____
4. _____
5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Are combustion/emission control instruments monitored at least every 15 minutes?

B. Is steady state maintained or corrections attempted?

C. Is stack plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?**

E. If yes to D above, were corrections made to return emissions to normal appearance?*

F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Are emergency shutdown controls and system alarms checked daily for proper operation?

*Not Inspected

*Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	—	—	—	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others
0 to 100.....	204 m 670 ft
101 to 1,000.....	380 m 1,250 ft
1,001 to 10,000.....	530 m 1,730 ft
10,001 to 30,000.....	690 m 2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	—	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	—	

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402? (725.502)	—	—	—	—
4. Are inspection procedures followed according to 265.403? (725.503)	—	—	—	—
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	—
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) (725.117 (b))	—	—	—	—

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	—	—	—	No wastes have been shipped
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	—	—	—	—
2. Name, mailing address, telephone number, and EPA ID Number of Generator	—	—	—	—

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	___	___	___	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	___	___	___	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	___	___	___	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	___	___	___	_____
7. Required certification?	___	___	___	_____
8. Required signatures?	___	___	___	_____
(C) Does the owner or operator submit exception reports when needed?	___	___	___	_____

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	___	___	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	___	___	___	<u>None shipped</u>
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	___	___	_____

~~Omit Section 3 if the facility has interim status and its Part A permit application describes storage~~

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?	___	___	___	_____
35 IL. A. C. 725.274 and 725.276				
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) (35 IL. A. C. 725.117 (b))	___	___	___	_____

VI. RECORDKEEPING and REPORTING

(Part 262, Subpart D)

35 IL. A. C. Part 722, Subpart D

Yes	No	NI*	Remarks
-----	----	-----	---------

- | | | | |
|-----|--|--------------------------------------|---|
| (A) | Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years? | <u>X</u> <u> </u> <u> </u> | <u>With exception of below</u> |
| (B) | Has the generator submitted Annual Reports and Exception Reports as required? | <u> </u> <u>X</u> <u> </u> | <u>Annual Report not submitted -- See Comment C</u> |

VII. INTERNATIONAL SHIPMENTS

(Part 262, Subpart E)

35 IL. A. C. Part 722, Subpart E

Has the installation imported
or exported Hazardous Waste?

X

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:
 - a. Notified the Administrator
in writing?
 - b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country?
 - c. Met the Manifest requirements?
2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements?

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263
35 IL. A. C. Part 723

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?

- Yes No NI* Remarks

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?

B. Are signed completed manifest(s) on file?

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?

B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

- Comment A -- No regular inspections are done of the storage area. This is located on the third floor of one of three buildings which make up this facility. This is a low to no traffic area with the only access being a freight elevator. The operating equipment of the plant is checked at the beginning of the production season. Safety and emergency equipment is regularly checked by their maintenance people. Mr. Kohl stated the required inspections of the area would be started. The possibility of operator errors, malfunctions, or discharges is extremely small, as handling is limited.
- Comment B -- Their emergency equipment consists of diatomaceous earth, or oiled vermiculite flakes. Quantities of these materials are generously situated throughout the plant. No map or description of these locations is available. Mr. Kohl said a written description would be made.
- Comment C -- No Annual Report has been submitted. If they did not have to store some of their hazardous wastes, they could qualify for a small quantity exemption. Through a mix up in communication, Kalo was told they did not need to file the report because of the small amount they generated. I told them that because of storage, the report was needed. Mr. Kohl said he would send in the report in the near future.

L P C F C O 5 5 C
(1) (8) (9)

ISS 11/16/83

INSPECTION REPORT - SITE INVENTORY NO. 00106510
(11) (18)

Adams

CO. - L.P.C.

Region # Central

Date 07/22/83
(20) (25)Quincy
(Location)Kabo Agri. Chemicals Inc
(Responsible Party) ILD068517093Letter Sent (Yes or No) Yes
(26)

Samples Taken: Yes () No (X) Time: From 01:00 PM

Weather Sunny, 80°

Ground Water() Surface() Other() To 03:00 PM

Photos Taken: Yes () No (X) Interviewed N. Kohl, Jr.

Inspector 6 E S
(27) (29)

Previous Inspection 4-24-81 Previous Correspondence

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X) Landfill () Storage (X)
Temporarily Closed () Random Dump () Salvage ()
Closed Not Covered () Other Generator (X) A.C.D. ()
Closed and Covered () Quantity Received Daily(1-6) 6
(30)E.P.A. Permit ()
Variance ()
21(e) ()
Board Order ()
Illegal (5) () NM
(31)

IMPROVED

SAME

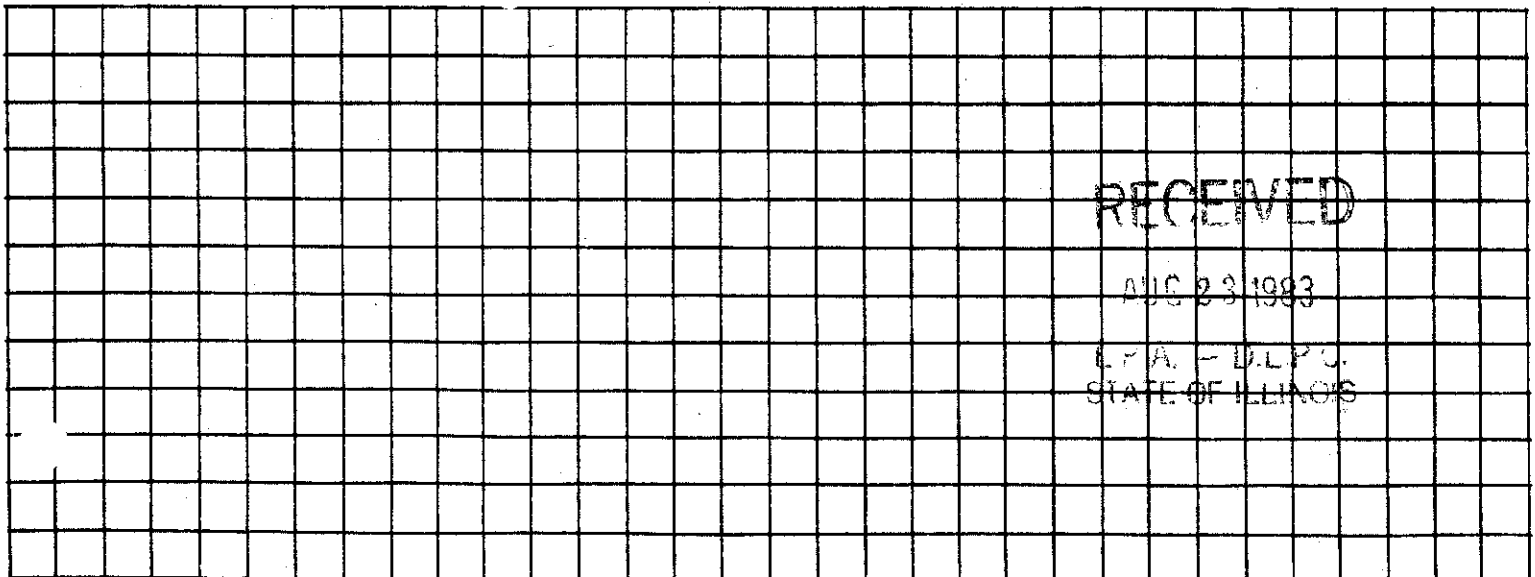
DETERIORATED

I (S) or D S
(62)

GENERAL REMARKS: This facility manufactures agricultural fungicides and insecticides for seed treatment by the individual farmer. The active ingredients are Captan and Thiram. Their hazardous waste is Thiram floor sweepings (4744). Personnel training involves covering the materials properties, respirator use and a physical exam. However, no records are maintained showing this. Emergency equipment consists of absorbent material for dry and liquid as Thiram. Large amounts of the material are placed at several locations around the plant. The contingency plan does not contain a list and location for these materials.

INTERVIEW: The storage area is located on the third floor of one of their three buildings. Access is via a freight elevator. This is a low traffic area, with waste being brought up very seldom. No inspections are done on a regular basis or are any documentation of inspection. They currently have 13 drums of Thiram on site. No wastes have been shipped out since Nov. 1980. Mr. Kohl stated the they could qualify for the small quantity exemption if they were not storing waste. This is what caused a problem until their annual report. Their engineering

DIAGRAM:





TO: Land Division File DATE: 07-27-83

FROM: Gerald E. Steele DLPC/POS Central Region ☒ Information only

SUBJECT: 00106510 Adams Co. Quincy / Kalo Agri. Chemicals, Inc. ☐ Response requested

asked how much wastes they generated. When informed of the amount, he informed Kalo that they did not need to submit a report. After finding out that storage requires an annual report no matter what the amount, Mr. Kohl said it would be taken care off.

They also have 12 drums of a discontinued product called "Rat Cocktail" in storage. The drums are boxes of glass containers and diatomaceous earth. The series of coincidences and errors have kept them from obtaining a disposal permit for this 1012 hazardous waste.

No closure plan has been drawn up.



0406510 Adams Co.
Quincy / Kalo Agri. Chem. Inc

Agricultural Chemicals, Inc.

525 Kentucky Street
Post Office Box 1086
Quincy, Illinois 62306
Phone: (217) 224-4000

March 3, 1983

United States
Environmental Protection Agency
Region V
230 South Dearborn St.
Chicago, IL 60604

Attention: Mr. John M. Love
Toxic Substances Branch

Dear Mr. Love,

To confirm our phone conversation today, and conform with your request, I am enclosing a photocopy of our 1981 EPA Form 3540-16 (Pesticide Establishment Report) as previously mailed on 1-20-82. As indicated, this report was submitted under company name of Kalo Agricultural Chemicals, Inc. and EPA Establishment No. 45989-IL-01. Also, our recently submitted 1982 Report was sent under same "new" name and Establishment No.

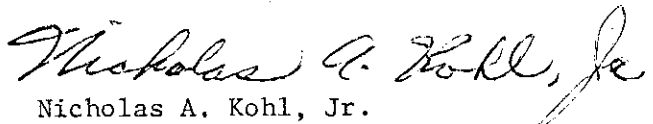
Transfer, or issuance of former Kalo Laboratories No. 15382IL01 to become Kalo, Inc. No. 45989-IL-01 was effective 5-26-81 (see enclosed photocopy of June 5, 1981 EPA, Washington letter).

Also enclosed are photocopies of Dec. 14, 1981 and Dec. 21, 1981 letters sent to your Chicago, Region V address to convey or confirm information concerning this transfer.

I'm sure you will call on us if further data is required to effectively change your records to reflect our current company name and EPA registration numbers.

Thank you.

Sincerely,


Nicholas A. Kohl, Jr.
Operations Manager

NAK/pag
Enclosures-4

RCRA INSPECTIONS

Adams County

Facility Name & Location U.S.E.P.A. Number I.E.P.A. Number	Part A/ Notification	Inspector(s) And Inspection Dates	Inspection Results	Date/Type Letter Sent	Date Response Due and Date Received	Referred To Or Date of Final Action
Kelo Agricultural Chemicals Inc 525 Kentucky Avenue Quincy, Ill. 62301 ID068577093 00106570	Notified As: Gen. <input checked="" type="checkbox"/> Trans. <input type="checkbox"/> T/S/D <input checked="" type="checkbox"/> U.I.C. <input type="checkbox"/> Part A & Notification Correct? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (If No, See Comments)	Inspector GGS --- Date of Inspection: 7/27/83 Previous Inspection Date 4/24/81	NOT REGULATED Small Qty. <input type="checkbox"/> Manifest, Record- keeping, Report. <input type="checkbox"/> Recycler <input type="checkbox"/> Groundwater <input type="checkbox"/> Non-handler <input type="checkbox"/> Closure/PC <input type="checkbox"/> Other <input type="checkbox"/> Financial <input type="checkbox"/> COMPLIANCE <input type="checkbox"/> Containers <input checked="" type="checkbox"/> Tanks <input type="checkbox"/> NON-COMPLIANCE Part 722 <input type="checkbox"/> Waste Piles <input type="checkbox"/> Part 723 <input type="checkbox"/> Land Treat. <input type="checkbox"/> PART 725 Incinerators <input type="checkbox"/> Gen. Fac. Stan. <input checked="" type="checkbox"/> Therm. Treat. <input type="checkbox"/> Prepar./Preven. <input type="checkbox"/> Chem./Phys./ Cont. Plan & <input type="checkbox"/> Biol. Treat. <input type="checkbox"/> Emerg. Proc. <input checked="" type="checkbox"/> U.I.C. <input type="checkbox"/>	--- Comp. <input type="checkbox"/> C.I.L. <input checked="" type="checkbox"/> P.E.C.L. <input type="checkbox"/> E.N.L. <input type="checkbox"/>	Due: <input type="checkbox"/> Received: <input type="checkbox"/> Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/> None Received <input type="checkbox"/>	Reinspection Necessary <input type="checkbox"/> EDG <input type="checkbox"/> (See Enf. Log) <input type="checkbox"/> Other <input type="checkbox"/> (<input type="checkbox"/>) Filed <input type="checkbox"/> Date: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>
New Follow-Up Annual Non-Notifier Telephone Verifications <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>				COMMENTS: 90 % Compliance		
Major Minor						

LPC 00166510
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD 0685 17093
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Kalo Laboratories
- (B) Street: 525 Kentucky at 6th St., PO Box 1086
- (C) City: Quincy (D) State: IL (E) Zip Code: 62301
- (F) Phone: (217) 224-4000 (G) County: ADAMS
- (H) Operator: SAME
- (I) Street: _____
- (J) City: _____ (K) State: _____ (L) Zip Code _____
- (M) Phone: _____ (N) County: _____
- (O) Owner: Kalo Laboratories
- (P) Street: 9233 Ward Parkway
- (Q) City: Kansas City (R) State: Mo. (S) Zip Code: 64114
- (T) Phone: (816) 363-1800 (U) County: Jackson
- (V) Date of Inspection: 4-24-81 (W) Time of Inspection (From) 11:15 AM (To) 12:30 pm
- (X) Weather Conditions: mostly cldy, 50°, windy

The following pages are not included in this report 11-18, 21 & 23.

(Y) Person(s) Interviewed	Title	Telephone
<u>Nicholas A. Kohl, Jr</u>	<u></u>	<u>(217) 224-4000</u>
<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>Phillip L Westen</u>	<u>EPA EPS 1</u>	<u>(217) 782-6760</u>
<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Phillip L Westen</u>	<u>EPA EPS 1</u>	<u>(217) 782-6760</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p style="margin-left: 20px;">→ 1. Containers (I)</p> <p style="margin-left: 20px;">2. Tanks (J)</p> <p style="margin-left: 20px;">3. Surface Impoundments (K)</p> <p style="margin-left: 20px;">4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>N/A</u>	—	✓	_____
2. Facility expansion?	—	—	✓	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	_____
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>N/A</u>	—	—	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	—	✓	—	<u>Building locked at night.</u>
2. Artificial or natural barrier around facility?	✓	—	—	_____
3. Controlled entry?	✓	—	—	_____
4. Danger sign(s) at entrance?	—	—	✓	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	_____
2. Records of operator error?	✓	—	—	_____
3. Records of discharges?	—	—	✓	<u>Waste such that will have no discharges.</u>

Not Inspected

III. GENERAL FACILITY STANDARDS Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	Machinery checked when in of season.
5. Safety, emergency equipment?	✓	---	---	-----
6. Security devices?	---	✓	---	-----
7. Operating and structural devices?	✓	---	---	checked during down time
8. Inspection log?	---	✓	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
				RESPIRATORY PROBLEMS IS MAIN ONE.
1. Job titles?	✓	---	---	-----
2. Job descriptions?	✓	---	---	-----
3. Description of training?	✓ + ✓	---	---	ON THE JOB TRAINING IS
4. Records of training?	---	✓	---	BASIC WAY - Read package warnings.
5. Have facility personnel received required training by 5-19-81?	✓	---	---	RECIEVE WHEN START
6. Do new personnel receive required training within six months?	✓	---	---	AT START OF WORK
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	N/A	---	---	-----
2. No smoking signs?	✓	---	---	-----
3. Separation and protection from ignition sources?	N/A	---	---	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— ☒ —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

☒ — —

Fire alarms.

2. Telephone or 2-way radios
at the scene of operations?

☒ — —

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ — —

Diatomaceous EARTH

Indicate the volume of water and/or foam available for fire control:

Sprinklers in leased AREA.

(C) Testing and Maintenance of
Emergency Equipment:

N/A

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

— — —

2. Is emergency equipment
maintained in operable
conditions?

— — —

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

N/A — —

*Not Inspected

- (E) Is there adequate aisle space for unobstructed movement? _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

- (A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

- | | | | | |
|---|----------|----------|-------|--|
| 1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) | <u>✓</u> | _____ | _____ | <u>Are now preparing one</u> |
| 2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37? | _____ | _____ | _____ | <u>DOES NOT APPLY</u> |
| 3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? | <u>✓</u> | _____ | _____ | _____ |
| 4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? | _____ | <u>✓</u> | _____ | <u>Not Listed, would only need brooms, dust pans, diatomaceous Earth and floor sweeping empl</u> |
| 5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?) | _____ | _____ | _____ | <u>DOES NOT APPLY</u> |

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	✓	—	<u>Not Necessary</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓	—	—	—
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓	—	—	—
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓	—	—	—
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	N/A	—	—

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	—	—	—	—
2. Are records of past shipments retained for 3 years?	—	—	—	—
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	—	—	—	—

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

c. The location and quantity of each hazardous waste within the facility?

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

f. Reports detailing all incidents that required implementation of the Contingency Plan?

g. All closure and post closure costs as applicable? (Effective 5-19-81)

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	_____	_____	_____	_____
2. Has this plan been submitted to the Regional Administrator	_____	_____	_____	_____
3. Has closure begun?	_____	_____	_____	_____
4. Is closure estimate available by May 19, 1981?	_____	_____	_____	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	_____	_____	_____	_____

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: KALO LABORATORIES Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>✓</u>	_____	_____	_____
2. Are containers compatible with waste in them?	<u>✓</u>	_____	_____	_____
3. Are containers stored closed?	<u>✓</u>	_____	_____	_____
4. Are containers managed to prevent leaks?	<u>✓</u>	_____	_____	_____
5. Are containers inspected weekly for leaks and defects?	_____	<u>✓</u>	_____	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	_____	<u>N/A</u>	_____	_____

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)		N/A		
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?		N/A		

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	_____	_____	_____✓	<u>No shipments at this time</u>
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	_____	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	_____	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	_____	_____	_____	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	_____	_____	_____	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	_____	_____	_____	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	_____	_____	_____	_____
7. Required certification?	_____	_____	_____	_____
8. Required signatures?	_____	_____	_____	_____
(C) Does the owner or operator submit exception reports when needed?	_____	_____	_____	_____

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	✓ _____	_____	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	✓ _____	_____	_____	_____
(C) If required, are placards available to transporters of hazardous waste?	✓ _____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	_____	_____	_____	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	_____	_____	_____	_____

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	_____	<input checked="" type="checkbox"/>	_____	_____
--	-------	-------------------------------------	-------	-------

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	_____	_____	_____	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	_____
c. Met the Manifest requirements?	_____	_____	_____	_____
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	_____	_____	_____	_____

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

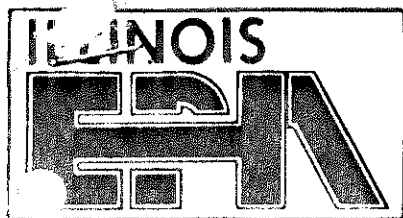
The facility security consists of locking the buildings at night. All waste is stored on the third floor of one of the buildings. All entry into the buildings is controlled through ~~one~~ main entrance and service entrance.

For ~~liquid~~ discharges there should not be any. All spills can be contained by either diatomaceous earth for liquid thiram or floor sweeping compound for the dry powdered thiram. This is then swept up and placed in specially marked barrels for disposal.

For inspections, since plant is seasonal, they are done during the down time. The inspections are of the bag collection system that has an automatic emptying system. If the bag appears to be going bad they are replaced. Otherwise there is no way to tell of a leak until a bag rips. All persons situated with the dry powder are required to wear breathing masks.

All training is on the job training and consists of instructing the employees how to handle the fungicide. They must read the instructions and warnings on the packaging.

They are in the process of preparing a contingency plan describing on how they clean up spilled liquid fungicide and dust fungicide.



Environmental Protection Agency

4500 S. Sixth Street Springfield, IL. 62706
Ph. (217) 786-6892

CERTIFIED MAIL
#P 731 931 493

September 14, 1984

Refer to: LPC #00106510 - Adams County
Quincy/Kalo Agricultural Chemicals
ILD #068517093

Kalo Agricultural Chemicals, Inc.
525 Kentucky Street
Quincy, Illinois 62301

ATTENTION: Mr. Nicholas Kohl

Dear Mr. Kohl:

On August 9, 1984, a representative of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your plant at Sixth and Kentucky in Quincy. The purpose of the inspection was to determine your facility's compliance with the Illinois Environmental Protection Act, Ill. Rev. Stat. 1984, Ch. 111½, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection, the following apparent violation was observed:

... You are in apparent violation of the 35 Illinois Administrative Code (35 IL. A. C.) 703.150 in that no Part A permit application was submitted to the U.S.E.P.A. prior to storage of hazardous waste. It was observed that you are no longer storing hazardous waste and that your plant has achieved compliance with all other applicable interim status standards. Therefore, our Agency will not require you to submit a Part A. You should, however, contact Mr. Robert Stone of the U.S.E.P.A. (312/886-0985) to determine if they will require a Part A.

Please be advised that, if in the future you decide to store hazardous waste, you must submit Part A and Part B permit applications to the U.S.E.P.A. prior to such storage.

RECEIVED

SEP 14 1984

IEPA-DLPC

Kalo Agricultural Chemicals, Inc.
Page 2
September 14, 1984

If you have any questions concerning this matter, please feel free to contact Mr. William Zierath at the above telephone number.

Sincerely,

Glenn D. Savage Jr.

Glenn D. Savage, Jr.
Central Region Manager
Land Field Operations Section
Division of Land Pollution Control

GDS/WEZ/cp

Enclosure

cc: DLPC/Division File
DLPC/FOS, Central Region

RECEIVED
SEP 14 1984
IEPA-DLPC



DATE: August 9, 1984
TO: Land Division File
FROM: William E. Zierath, ^{WZZ}DLPC/FOS - Central Region
SUBJECT: LPC # 00106510 - ADAMS COUNTY - QUINCY/KALO AGRICULTURAL CHEMICALS
ILD # 068517093

An Interim Status Standards Inspection was conducted at this seed inoculant manufacturing plant on August 9, 1984. Mr. Nicholas Kohl, Production Manager, was interviewed.

This plant was classified as a storage facility during the previous inspection when it was determined that they were storing about 1500 kg of a rat poison consisting mainly of arsenic (III) oxide (P012). This plant has not filed a Part A permit application. In July of 1984 the rat poison was transported to the hazardous waste landfill at Emelle, Alabama for disposal. I reviewed the manifest from the shipment. According to Mr. Kohl, Kalo will not be storing hazardous waste in the future.

The other types of hazardous waste are generated by their packaging and use of Thiram (U224). The major form of waste was floor sweeping from around the production area. The other source of thiram waste was wastewater from cleaning the equipment. Mr. Kohl said that this wastewater would be used as production water during the next production season. Since they had about 700 kg of this waste in storage, this appeared to be subject to the exemption in 35 Ill. Adm. Code 721.106.

The waste storage/accumulation area was located at the east end of the third floor of the building. The third floor was used for storage of packaged materials and unused packaging. The drums used for storing and wastewater appeared to be in good condition.

The employee training at the plant is conducted yearly, in the Spring, before their 3 month production season. Because the products produced often had as high or higher concentrations of thiram and other non-listed, but potentially hazardous chemicals, the hazardous waste training was considered a minor part of the overall worker safety training. Mr. Kohl, as an aside, told me that he did not have to do much work to comply with the recently promulgated Worker's Right to Know regulations because Kalo's philosophy is such that the required information was provided prior to beginning work.

Kalo had gotten written verification from the local hospital that they would be able to treat anyone suffering from poisoning by any chemical used at the facility.

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SEP 14 1984

IEPA-DLPC

August 9, 1984

LPC # 00106510 - ADAMS COUNTY - QUINCY/KALO AGRICULTURAL CHEMICALS

ILD # 068517093

Page 2

The only apparent violations of the interim status standards, aside from not filing a Part A permit application, was the lack of a written analysis plan and the lack of an adequate job description. I told Mr. Kohl that he could send the information to me within one week or wait until the letter arrived and then send it to me.

WEZ:js

cc: DLPC/FOS - Central Region File

RECEIVED

SEP 14 1984

IEPA-DLPC

LPC 00166510
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD 0685 17093
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Kalo Laboratories
(B) Street: 525 Kentucky at 6th St., PO Box 1086
(C) City: Quincy (D) State: IL (E) Zip Code: 62301
(F) Phone: (217) 224-4000 (G) County: ADAMS
(H) Operator: SAME AS ABOVE
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: Kalo Laboratories
(P) Street: 9233 Ward Parkway
(Q) City: Kansas City (R) State: Mo. (S) Zip Code: 64114
(T) Phone: (816) 363-1800 (U) County: Jackson
(V) Date of Inspection: 4-24-81 (W) Time of Inspection (From) 11:15 AM (To) 12:30 PM
(X) Weather Conditions: mostly cldy, 50°, windy

The following pages are not included in this report 11-18, 21 & 23.

(Y) Person(s) Interviewed	Title	Telephone
<u>Nicholas A. Kohl, Jr</u>	<u></u>	<u>(217) 224-4000</u>
<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>Phillip L Westen</u>	<u>EPA EPS 1</u>	<u>(217) 782-6760</u>
<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>Phillip L Westen</u>	<u>EPA EPS 1</u>	<u>(217) 782-6760</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|--|--|
| <p><input checked="" type="checkbox"/> <u>A.</u> Storage and/or Treatment</p> <p style="margin-left: 20px;">→ 1. Containers (I)</p> <p style="margin-left: 20px;">2. Tanks (J)</p> <p style="margin-left: 20px;">3. Surface Impoundments (K)</p> <p style="margin-left: 20px;">4. Waste Piles (L)</p> <p><u>B.</u> Land Treatment (M)</p> <p><u>C.</u> Landfills (N)</p> | <p><u>D.</u> Incineration and/or Thermal Treatment (O and P)</p> <p><u>E.</u> Chemical, Physical, and Biological Treatment (Q)</p> |
|--|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>N/A</u>	—	✓	_____
2. Facility expansion?	—	—	✓	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	_____
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>N/A</u>	—	—	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	—	✓	—	<u>Building locked at night</u>
2. Artificial or natural barrier around facility?	✓	—	—	_____
3. Controlled entry?	✓	—	—	_____
4. Danger sign(s) at entrance?	—	—	✓	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	_____
2. Records of operator error?	✓	—	—	_____
3. Records of discharges?	—	—	✓	<u>Waste such that will have no discharges.</u>

*Not Inspected

II GENERAL FACILITY STANDARDS - continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	<u>Machinery checked when in off season.</u>
5. Safety, emergency equipment?	✓	---	---	-----
6. Security devices?	---	✓	---	-----
7. Operating and structural devices?	✓	---	---	<u>checked during down time</u>
8. Inspection log?	---	✓	---	-----
(E) Do personnel training records include: (Effective 5/19/81)	RESPIRATORY PROBLEMS IS MAIN ONE.			
1. Job titles?	✓	---	---	-----
2. Job descriptions?	✓	---	---	-----
3. Description of training?	✓ + ✓	---	---	<u>ON THE JOB TRAINING IS</u>
4. Records of training?	---	✓	---	<u>BASIC WAY - Read package warnings.</u>
5. Have facility personnel received required training by 5-19-81?	✓	---	---	<u>RECEIVE WHEN START</u>
6. Do new personnel receive required training within six months?	✓	---	---	<u>AT START OF WORK</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	N/A	---	---	-----
2. No smoking signs?	✓	---	---	-----
3. Separation and protection from ignition sources?	N/A	---	---	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

___ ✓ ___

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

✓ ___

Fire alarms.

2. Telephone or 2-way radios
at the scene of operations?

✓ ___

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ ___

Diatomaceous EARTH

Indicate the volume of water and/or foam available for fire control:

Sprinklers in leased AREA.

(C) Testing and Maintenance of
Emergency Equipment:

N/A

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

2. Is emergency equipment
maintained in operable
conditions?

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

N/A

*Not Inspected

- (E) Is there adequate aisle space for unobstructed movement? _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

- (A) Does the Contingency Plan contain the following information:

	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Are now preparing one</u>
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>DOES NOT APPLY</u>
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Not listed, would only need brooms, dust pans, diatomaceous Earth and floor sweeping equip</u>
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>DOES NOT APPLY</u>

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	✓	—	<u>Not Necessary</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓	—	—	—
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓	—	—	—
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓	—	—	—
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	N/A	—	—

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	—	—	—	—
2. Are records of past shipments retained for 3 years?	—	—	—	—
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	—	—	—	—

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

c. The location and quantity of each hazardous waste within the facility?

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

f. Reports detailing all incidents that required implementation of the Contingency Plan?

g. All closure and post closure costs as applicable? (Effective 5-19-81)

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	_____	_____	_____	_____
2. Has this plan been submitted to the Regional Administrator	_____	_____	_____	_____
3. Has closure begun?	_____	_____	_____	_____
4. Is closure estimate available by May 19, 1981?	_____	_____	_____	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	_____	_____	_____	_____

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: KALO LABORATORIES Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>✓</u>	_____	_____	_____
2. Are containers compatible with waste in them?	<u>✓</u>	_____	_____	_____
3. Are containers stored closed?	<u>✓</u>	_____	_____	_____
4. Are containers managed to prevent leaks?	<u>✓</u>	_____	_____	_____
5. Are containers inspected weekly for leaks and defects?	_____	<u>✓</u>	_____	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	_____	<u>N/A</u>	_____	_____

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			N/A	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			N/A	

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	___	___	✓	<u>No shipments at this time</u>
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	___	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	___	___	___	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	_____	_____	_____	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	_____	_____	_____	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	_____	_____	_____	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	_____	_____	_____	_____
7. Required certification?	_____	_____	_____	_____
8. Required signatures?	_____	_____	_____	_____
(C) Does the owner or operator submit exception reports when needed?	_____	_____	_____	_____

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	✓ _____	_____	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	✓ _____	_____	_____	_____
(C) If required, are placards available to transporters of hazardous waste?	✓ _____	_____	_____	_____

VI. RECORDKEEPING and REPORTING

Yes	No	NI*	Remarks
-----	----	-----	---------

- (A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

- (B) Has the generator submitted Annual Reports and Exception Reports as required?

VII. INTERNATIONAL SHIPMENTS

Has the installation imported
or exported Hazardous Waste?

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

- a. Notified the Administrator
in writing?

- b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

- c. Met the Manifest requirements?

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements?

[illegible]

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The facility security consists of locking the buildings at night. All waste is stored on the third floor of one of the buildings. All entry into the buildings is controlled through ~~one~~ main entrance and service entrance.

For ~~discharge~~ discharges there should not be any. All spills can be contained by either diatomaceous earth for liquid thiram or floor sweeping compound for the dry powdered thiram. This is then swept up and placed in specially marked barrels for disposal.

For inspections, since plant is seasonal, they are done during the down time. The inspections are of the bag collection system that has an automatic emptying system. If the bag appears to be going bad they are replaced ~~is~~ Otherwise there is no way to tell of a leak until a bag rips. All persons situated with the dry powder are required to wear breathing masks.

All training is on the job training and consists of instructing the employees how to handle the fungicide. They must read the instructions and warnings on the packaging.

They are in the process of preparing a contingency plan describing on how they clean up spilled liquid fungicide and dust fungicide.

L P C F C O 5 5 C
(1) (8) (9) ILD 0685/7093OBSERVATION REPORT - SITE INVENTORY NO. 00106510
(11) (18)

Adams

CO. - L.P.C.

Region # C

Date 04/24/81

(20) (25)

Letter Sent (Yes or No) N

(26)

Quincy / Kals Labs
(Location) (Responsible Party)

Samples Taken: Yes () No (X) Time: From 11:15 A M

Weather Mostly cloudy ~50°

Ground Water () Surface () Other () To 12:30 P M

Photos Taken: Yes () No (X) Interviewed Nicholas Kahl Jr.

Inspector P L W

(27) (29)

Previous Inspection NONE Previous Correspondence NONE Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)	Landfill ()	Storage (X)	E.P.A. Permit () N/A
Temporarily Closed ()	Random Dump ()	Salvage ()	Variance ()
Closed Not Covered ()	Other ()	A.C.D. ()	21(e) ()
Closed and Covered ()	Quantity Received Daily(1-6) 1		Board Order ()
	(30)		Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

I (S) or D S
(62)

GENERAL REMARKS: This facility manufactures the fungicide thiram for soybeans in both a dry powder and a liquid form. The manufacturing of the fungicide is seasonal with a short shelf life, the main months of production are December, March and May. The remaining months are spent checking equipment with a skeleton crew only. The other personnel work only during the "season" and receive on the job training along with medical checkups. They must be able to use a half-face cartridge respirator without any problems if they are to work with the dry fungicide. Training is such that personnel are trained on the job and must read and understand the warnings and handling procedures on the

INTERVIEW: Labels (these are the same way the farmers are instructed to handle it). The waste stream is contaminated powder or liquid. Contaminated by being mixed with floor dust and/or diatomaceous earth. Spills are controlled by floor sweeping compound for the dust and an application of diatomaceous earth to soak up the liquid. This is then swept up and placed in a large 55 gallon barrel and stored until a truck load is reached. The waste is stored in the upstairs section of the building, since this waste is hazardous only by EPT toxicity there is no problem with storage in this area. Also in this area are several barrels of rat poison

DIAGRAM: that can no longer be sold or used. This is a one time set up and will be ended when the barrels are shipped off.

Inspection of the barrels was not being done on a weekly basis. After being told this was needed they said they would start up a record of inspecting them. The equipment is gone over completely during the off season and special vacuum bags are replaced if they appear to be worn.

A written copy of a contingency plan was not available at the time of the inspection. Nicholas stated he would have their cleanup procedure written up which appeared to be adequate.

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO.

CO. - L.P.C.

Region #

Date

(20) / (25)

Letter Sent (Yes or No)

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No () Time: From 11 : 15 A m

Weather partly cloudy - 50

Ground Water () Surface () Other () To 12 : 10 P m

Photos Taken: Yes () No () Interviewed Nicholas Kahl Jr

Inspector P L

(27) (29)

Previous Inspection NAME Previous Correspondence NAME

Site Open: Yes () No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

Board Order ()

(30)

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

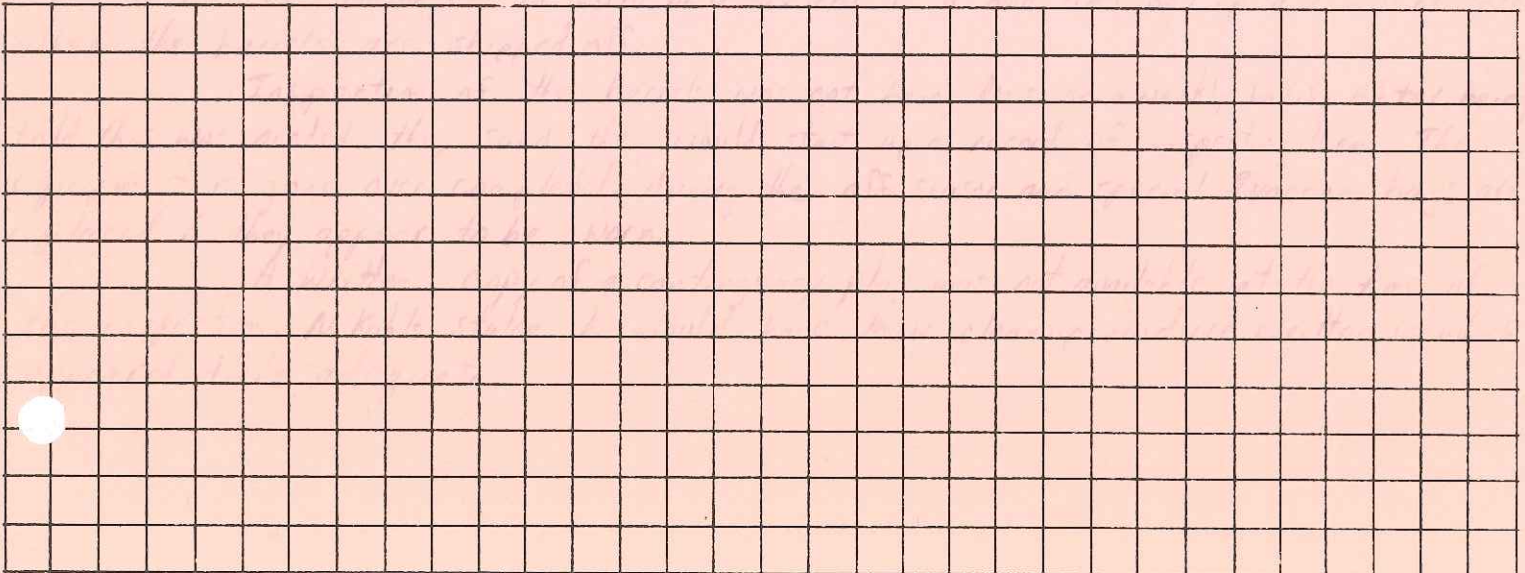
I S or D

(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:



**D. Corrective
Action**



217/782-6762

Refer to: 0010650010 -- Adams County
Quincy/Kalo Agricultural
ILD068517093
RCRA General

May 4, 1987

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SWD - MJS
U.S. EPA, REGION V

Karl E. Bremer, Chief
Technical Program Section
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Bremer:

Enclosed you will find the following:

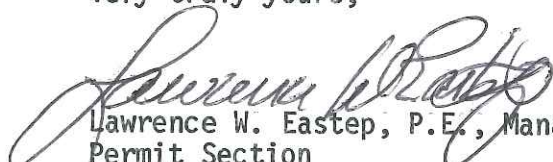
1. The Initial Screening for Environmental Significance form for the above referenced facility.
2. A copy of the Certification Regarding Potential Releases from Solid Waste Management Units for the above referenced facility and/or the reply the Agency received in response to our request for information regarding the above.

The following form(s) were not on file at the IEPA for this facility:

1. Notification of Hazardous Waste Site (EPA Form 8900-1).
2. Preliminary Assessment (EPA Form 2070-12).

If you have any questions regarding this initial screening, please contact Eugene W. Dingledine of my staff at 217/785-2892.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:EWD:sf/2417g,18

Enclosure

cc: Division File
USEPA Region V -- Mary Murphy
FOS Central Region

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS
(CLOSURE PLAN REVIEW)

FACILITY NAME: Kalo Agricultural Chemicals, Inc.
 EPA I.D. NUMBER: 068517093/0010650010
 LOCATION CITY: Quincy
 STATE: Illinois

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

	YES	NO
• Landfill	_____	<u>X</u>
• Surface Impoundment	_____	<u>X</u>
• Land Farm	_____	<u>X</u>
• Waste Pile	_____	<u>X</u>
• Incinerator	_____	<u>X</u>
• Storage Tank (Above Ground)	_____	<u>X</u>
• Storage Tank (Underground)	_____	<u>X</u>
• Container Storage Area	_____	<u>X</u>
• Injection Wells	_____	<u>X</u>
• Wastewater Treatment Units	_____	<u>X</u>
• Transfer Stations	_____	<u>X</u>
• Waste Recycling Operations	_____	<u>X</u>
• Waste Treatment, Detoxification	_____	<u>X</u>
• Other _____	_____	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

 N/A

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

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3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan. please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released .
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N/A

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

James R. Scott/Vice President-Operations

Typed Name and Title

James R. Scott
Signature

February 12, 1987
Date

FEB 17 1987
EPADLAC